FEDERAL ELECTION COMMISSION SECRETARIAT

COPY

SECRETARIAT 5549

Complaint against STEPHEN ADAMS
for violation of the Federal Election Campaigh SEP 29
Act

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SENSITIVE

- A number of highway billboards have been posted in central and western Michigan, and, upon information and belief, in Indiana. These billboards display messages in support of Bush/Cheney '04. One such billboard has the following message. It's your money Bush/Cheney '04. Another billboard states. Boots or flip-flops?

 Bush/Cheney '04.
- The billboards also display the following message Personal message paid for and sponsored by Stephen Adams
- The billboards violate Section 441d(a)(3) of the FECA, because they do not state the address and telephone number or web address of the person who paid for them. They also do not state whether they were authorized by the candidate or the candidate's committee, as required under that Section.
- Upon information and belief, as indicated in documents filed with the Michigan Bureau of Commercial Services (attached hereto), Stephen Adams is a principal and officer in a Minnesota corporation named Adams Outdoor Advertising, Inc., whose Michigan registered agent is CT Corporation System, 30600 Telegraph Rd., Bingham Farms MI 48026

Upon information and belief, some if not all of the billboards described above are owned or leased by Adams Outdoor Advertising, Inc. It is unknown whether and to what extent Stephen Adams has paid or reimbursed Adams Outdoor Advertising, Inc. for his use of the billboards in support of Bush/Cheney '04. To the extent that payment of fair market value for use of the billboards has not been made by Stephen Adams, Adams Outdoor Advertising, Inc. has made an expenditure or contribution in violation of Section 441b(a) of the FECA, and Stephen Adams has knowingly participated in such unlawful expenditure or contribution.

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Based on the foregoing, Stephen Adams should be found to have violated Section 441d of the FECA and should be ordered to remove the unlawful billboards. Further, the FEC should investigate transactions between Adams and Adams Outdoor Marketing, Inc in connection with the billboards to determine whether additional senous violations of the FECA have occurred

Respectfully submitted

ModSwor

Dated

Subscribed and sworn to before me

th<u>ந இ</u> day of <u>So. தி.</u> 2004

NOTARY PUBLIC, The ham COUNTY, MI

My Commission Expires

JOANNE C WAYMAN NOTARY PUBLIC INGHAM CO , NE MY COMMISSION EXPIRES New 18, 2000 DESCRIPTION PARTY

MICHGAN DEPARTMENT OF CONGLIMER & MIDUSTRY SERVICES
BUREAU OF COMMERCIAL SERVICES, CORPORATION DIVISION
2005 POREIGN CORPORATION INFORMATION UPDATE



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2003 POREIGH CORPORATION INFORMATION UPDATE				
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